

Concerning claim 1, the method disclosed in the Applicant's invention is patentably distinct from the method disclosed in Matthews. Matthews teaches interactive viewer control of camera viewpoints placed in multiple positions in a sporting contest. For example in a baseball game, figure 2 and table 1 of Matthews show cameras aimed at center field, first base, the first baseline, the third baseline, third base and home plate. All of the cameras are aimed at a player position or field area. The viewer must constantly switch camera position channels in order to follow a contest. (see Matthews, col. 4, lines 50-62) The Applicant's method includes the step of having each of the participants in the sporting event provided with a camera. In the specific situation of a race car event, each car or driver helmet would be equipped with a camera. Instead of looking at the field position or player such as in Matthews, the Applicant's method allows a viewer to watch the event from the perspective of the participant in the sporting event. In effect, rather than looking at someone, the Applicant's method allows a viewer to look through their eyes.

The Applicant's method provides a great advantage over Matthews and the prior art. Motorsports entertainment provides the best example of how the method may be utilized. Fans of motorsports entertainment typically follow one particular driver with great interest, at times to the exclusion or with express aversion to all other drivers. The Applicant's method as recited in claim 1 would allow a fan to view the entire race from the driver's perspective. In the method recited by Matthews, viewing a race through a camera positioned in a stationary position on the racetrack would only allow a viewer to see his or her driver for a brief instant of each lap. Or, if a viewer wanted to watch his driver for the entire race, the viewer would have to constantly switch camera angles. The primary interest of the viewer is not to view the various positions of the track or to quickly switch a remote handset in order to view a car, but

rather to see the entire race from the standpoint of the driver himself. Matthews fails to give the viewer the ability to see or hear what a live participant of the viewer's particular interest is seeing or hearing.

The Applicant's method is able to capture the excitement of a live sporting event. Rather than switching from camera to camera to view the sporting action as required by Matthews, the Applicant's method allows a viewer to see and hear the action in the same manner as a participant does. In the motorsports example, a viewer virtually rides with the driver, experiencing the track conditions and experiencing the positioning of the driver's vehicle in relation to the competitors. The viewer is able to experience firsthand the excitement of events impacting the driver, including near collisions, pit stops, driving through clouds of smoke, and making tight passes.

In particular to claim 13, the Examiner states: "one of ordinary skill in the art would obviously take Matthew's teaching of interactive television system and manipulate it into a race car competition scene for providing an amazing and thrilling experience for race car audiences." As stated above, applying the teachings of Matthews to motorsports competition would result in a different experience for a viewer than the Applicant's invention as recited by claim 13. Matthews teaches cameras positioned at different positions on a field, or in the motorsports example, on a section of track. In Matthews, switching stations to maintain the camera on the viewer's driver of interest would become arduous and impractical. Claim 13 allows the viewer to see the entire race through the perspective of the driver. As stated above, rather than allowing a viewer to look at a section of track or car, claim 13 of the Applicant's invention allows the viewer to watch the race virtually through the eyes of the participant.

In paragraph 4, beginning on page 3 of the Office Action, the Examiner asserts that the

Applicant's invention is "reminiscent" of a real NASCAR scene, a NASCAR video game, and Arena football. In regards to the NASCAR and Arena football, cameras are placed on individual participants, but viewers are unable to select from a plurality of views while watching the sporting event. In regards to the NASCAR video game, it would not have been obvious to modify the teachings of Matthews with a video game. Furthermore, the combination of these references would not yield the subject matter of claim 1 of the Applicant's invention. Furthermore, there is no teaching, suggestion, or motivation to combine the teachings of Matthews and any of the prior art scenes.

Accordingly, claims 1, 4-6, 10 and 12-14, are unobvious over Matthews.

The Examiner also rejected claims 2, 3, 7-9 and 11 under 35 U.S.C. §103(a) as being unpatentable over Matthews in view of Vacelette (5, 894, 320).

In specific reference to claim 2, the Examiner states: "Vancelette teaches that the viewer can listen to an audio feed of the sporting event's participants." Specifically, Vancelette actually teaches: "a viewer may not want to hear the announcer at all, but may wish to listen to a field level audio feed." (col. 5, lines 42-47) The Applicant reads this statement as teaching the sideline listening devices currently used by the broadcasters of sports such as football. Vancelette fails to teach or suggest equipping each participant with his or her own microphone or camera.

Like the Matthews reference, the teachings of Vancelette are patentably distinct from the Applicant's invention. Vancelette teaches a system that allows a television viewer to select specific camera angles and audio feeds of an event which is broadcast by a programming service provider. Vancelette fails to teach a method that allows a viewer to see and hear the action of a sports entertainment program from the perspective of the participant. Thus, even if

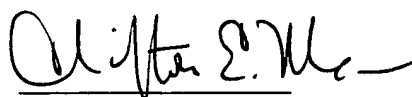
the references were combined, the results would not yield the Applicant's invention.

Finally, with respect to claim 9, the present invention allows the provider of the video images to keep track of viewers' requests for camera feed as a function of the participants of interest, and this in turn allows a more effective way to compensate participants and price advertising opportunities. There is no express or implied motivation provided in the prior art to achieve this aspect of the claimed invention. In Matthews, for example, viewers' selections of portions of a playing field does not permit an effective means for allocating interest to particular participants since Matthews provides no means for determining who, among a plurality of participants, is present in the selected portion or for tabulating the amounts of time the viewers chose to watch respective participants.

Accordingly, claims 2, 3, 7-9 and 11 are unobvious over Matthews in view of Vancelette.

In view of the foregoing description, it is respectfully submitted that the present invention defined in claims 1-14 are patentably distinguishable over the prior art of record and that the present application is thus in condition for allowance.

Respectfully submitted,



Clifton E. McCann  
Registration No. 29,565  
VENABLE  
1201 New York Avenue, N.W.  
Suite 1000  
Washington, DC 20005-3917  
Telephone: (202) 962-4800  
Direct dial: (202) 216-8162  
Telefax : (202) 962-8300

Correspondence Address:  
Venable  
Post Office Box 34385  
Washington, DC 20043-9998

CEM/CCA